

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

**KEVIN D. MARTIN, and all others
similarly situated,**

Plaintiff

v.

**FAIR COLLECTIONS &
OUTSOURCING, INC.,**

Defendant

Case No. 8:14-cv-03191-GJH

CLASS ACTION

**MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT,
CONDITIONALLY CERTIFYING CLASSES FOR PURPOSES OF SETTLEMENT,
APPOINTING CLASS COUNSEL, DIRECTING NOTICE TO THE CLASS, AND
SCHEDULING FINAL APPROVAL HEARING**

Pursuant to Fed. R. Civ. P. 23(c), and for the reasons set forth more fully in the attached Memorandum of Law, Plaintiff Kevin D. Martin moves the Court for an Order preliminarily approving the settlement of this class action, approving the form and method for providing class-wide notice and scheduling a hearing at which the following will be considered: request for final approval of the proposed settlement, entry of the Final Approval Order and Plaintiff's request for approval of agreed-upon fees and costs. Defendant does not contest the requested relief.

DATED: February 16, 2016

Respectfully submitted,

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/s/ David A. Searles

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CERTIFICATE OF SERVICE

I hereby certify that on the date below, I filed a true and correct copy of the foregoing via the Court's Electronic Case Filing System, which will send a notice of electronic filing to all counsel of record.

Date: February 16, 2016

s/ David A. Searles
David A. Searles